

Selendy & Gay PLLC
1290 Avenue of the Americas
New York NY 10104
212 390 9000

Andrew R. Dunlap
212 390 9005
adunlap@selendygay.com


**Selendy
& Gay**

December 20, 2021

Via ECF

The Honorable Edgardo Ramos
United States District Judge
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The application is X granted
 denied



Edgardo Ramos, U.S.D.J.
Dated: 12/21/2021
New York, New York 10007

**Re: *Deutsche Bank Securities Inc. v. Kingate Global Fund Ltd., et al.,*
 No. 19-cv-10823-ER (S.D.N.Y.)**

Dear Judge Ramos,

We write on behalf of Defendants Kingate Global Fund Ltd. and Kingate Euro Fund Ltd. (the “Funds”) for approval to file a redacted version of Defendants’ memorandum of law in opposition to Plaintiff’s, Deutsche Bank Securities Inc. (“DBSI”), motion to compel (“Opposition Brief”).

The Opposition Brief summarizes the content of documents that the Funds designated as “Confidential” under the Protective Order. This designation represents the Funds’ good faith judgment that disclosure of the information contained therein would “be detrimental to the conduct of the [Funds’] business or the business of any of the [Funds’] customers or clients.” *Id.* ¶ 2(a). The parties agreed that any such information must be filed under seal consistent with Paragraph 3.ii of Your Honor’s Individual Practices. *See* ECF No. 48 ¶ 12. The Opposition Brief will be filed herewith in proposed redacted form in accordance with those rules.

DBSI previously sought and received approval to file copies of these same documents under seal as Exhibits 9-12 to the Sealed Declaration of Andrew W. Hammond (ECF No. 71), as well as discussions of those documents in its sealed memorandum of law in support of its motion to compel (ECF No. 69). *See* ECF No. 65 (DBSI’s letter motion to seal); ECF No. 72 (order granting DBSI’s letter motion to seal).

The Honorable Edgardo Ramos
December 20, 2021

The Funds respectfully request that the Court grant this letter motion allowing the Funds to file the proposed redacted version of the Opposition Brief.

Respectfully submitted,

/s/ Andrew R. Dunlap

Andrew R. Dunlap

Cc: Counsel of Record (via ECF)